

### REMARKS

This application has been carefully reviewed in light of the Office Action dated September 10, 2008. Claims 1, 3 to 8, 10 to 31 are in the application, with Claims 26 to 31 having been newly added herein. Claims 1, 6 to 8, and 12 are independent. Reconsideration and further examination are respectfully requested.

Initially, Applicants thank the Examiner for the indication that Claims 3 and 10 contain allowable subject matter and would be allowable if rewritten into independent form as well as amended to overcome a rejection under 35 U.S.C. § 101.

In addition, Applicants thank the Examiner for the courtesies extended to Applicants' representatives during a telephonic interview on December 30, 2008. During that interview, the rejection under 35 U.S.C. § 101 was discussed as well as the cited reference U.S. Patent Publication No. 2004/0268241 (Layman). During that interview, no agreement was reached regarding the subject matter of the claims. Applicants submit that the foregoing amendments and following remarks fully summarize the substance of the interview.

Claims 1, 3 to 8, 10 and 12 have been amended and Claims 26 to 31 have been newly-added herein. Support for changes to amended Claims 1, 3 to 8, 10 and 12 may be found in the specification at pages 9 to 13. Additionally, support for new Claims 26 to 31 may be found at page 13, lines 15 to 20 of the specification.

Formal objections were lodged against the specification. The specification has been amended to include descriptive headings, as suggested by the Examiner. The specification has also been amended to delete the hyperlink at page 3 and to replace it with the title of the document to which the hyperlink pertains. The objections are believed to be

attended to by these amendments, as set forth above, and withdrawal of the objections is respectfully requested.

Claim 1 was objected to for an informality. Without conceding the correctness of the objection, Claim 1 has been amended as requested by the Examiner. Accordingly, Applicants respectfully request withdrawal of this objection.

Claims 1, 3, 8 and 10 were rejected under 35 U.S.C. § 101, as being directed to non-statutory subject matter. In particular, the Office Action took the position that the rejected claims have no useful, concrete, and tangible result if the number of blocks is not equal to zero. Without conceding to the correctness of the rejections, Claims 1, 3, 8, and 10 have been amended, and withdrawal of these rejections is respectfully requested.

Claim 7 was under 35 U.S.C. § 112, second paragraph, as being indefinite. Without conceding to the correctness of the rejection, Claim 7 has been rewritten in independent form. Reconsideration and withdrawal of the rejection are respectfully requested.

Claims 1, 2, 4 to 9 and 11 to 25 were rejected under 35 U.S.C. § 102(e) over U.S. Patent Publication No. 2004/0268241 (Layman). Applicants respectfully traverse this rejection.

Claims 1, 7, and 8:

Turning to specific claim language, independent Claim 1 is directed to a method of translating a message represented in a first markup language into a second markup language. The message represented in a first markup language comprises a

succession of blocks respectively associated with an address attribute of the blocks, the address attribute being chosen from a set of attributes comprising references to a recipient station of the message in a communication network, references to an intermediate station of the communication network and references to a next station in the transmission of the message over the communication network. The second markup language comprises at least two groups of blocks, a first group being a header adapted to comprise blocks addressed to one or more intermediate stations of the communication network and a second group being a body adapted to comprise blocks addressed to the recipient station of the communication network. The method comprises the steps of identifying blocks of the message associated with an address attribute comprising a reference to the recipient station of the communication network, if any blocks associated with an address attribute comprising a reference to the recipient station are identified adding the identified blocks to the body, obtaining the number of blocks written in the body, if the number of blocks written in the body is equal to zero adding to the body at least a single block chosen from a blocks of the message associated with an address attribute comprising a reference to the next station, and if the number of blocks is different than zero adding the blocks of the message associated with an address attribute comprising a reference to the next station to the header.

Thus, among other notable features, Claim 1 recites (i) if any blocks associated with an address attribute comprising a reference to said recipient station are identified, adding said identified blocks to said body, (ii) if said number of blocks written in the body is equal to zero, adding to the body at least a single block chosen from blocks of the message associated with an address attribute comprising a reference to said next

station, and (iii) if the number of blocks written in the body is different than zero, adding the blocks of the message associated with an address attribute comprising a reference to said next station to said header.

The applied art is not seen to disclose or suggest at least the above-discussed features. Since the applied art does not disclose or suggest the foregoing features, it also cannot disclose or suggest the attendant benefits of such features, including having some blocks of the message inserted in the header and other blocks of the message inserted in the body such that the body comprises at least one block.

As understood by Applicants, Layman discloses an object persister which serializes an object to preserve the object's data structure and its data. The serialized object is encoded using XML and inserted into a message to be transmitted over a network. In one embodiment of Layman, the message is a SOAP message having a mandatory envelope, an optional header and a mandatory body. See Layman page 3, paragraph [0047] and Appendix A. According to Layman, the object persister serializes the object by generating a datastruct element which is inserted into only the body of the message. The message is then sent to the destination entity to be parsed and deserialized. See Layman, pages 4 to 5, paragraphs [0080] to [0082].

Thus, while Layman might be read by some to show some sort of translation of a message, the object persister of Layman inserts a data element into merely one group of the SOAP message to accomplish such translation. In contrast, Claim 1 discloses adding blocks to a first group of blocks and to a second group of blocks.

Accordingly, Layman is not seen to disclose or suggest at least the features of (i) if any blocks associated with an address attribute comprising a reference to said

recipient station are identified, adding said identified blocks to said body, (ii) if said number of blocks written in the body is equal to zero, adding to the body at least a single block chosen from blocks of the message associated with an address attribute comprising a reference to said next station, and (iii) if the number of blocks written in the body is different than zero, adding the blocks of the message associated with an address attribute comprising a reference to said next station to said header.

Independent Claim 7 is a method of generating a message in a second markup language substantially corresponding to the method of Claim 1. Independent Claim 8 is an apparatus claim substantially corresponding to the method of Claim 1. Accordingly, Applicants submit that Claims 7 and 8 are also in condition for allowance and respectfully request the same.

Claims 6 and 12:

Independent Claim 6 as amended is directed to a method of reverse translation of a message represented in a second markup language into a first markup language. The message represented in a second markup language comprises at least two groups of blocks, a first group being a header adapted to comprise at least blocks addressed to one or more intermediate stations of the communication network and possibly blocks addressed to a recipient station, and a second group being a body adapted to comprise blocks addressed to the recipient station of the communication network. The message in the first markup language comprises a succession of blocks associated respectively with an address attribute of the blocks, the address attribute being chosen from a set of attributes comprising references to a recipient station of the message in a communication network,

references to an intermediate station of the communication network and references to a next station in the transmission of the message over the communication network. The method of reverse translation comprises the steps of extracting the blocks of the header, extraction of the blocks of the body, and writing the blocks of the header then of the blocks of the body.

The applied art does not disclose or suggest the subject matter of Claim 6. In particular, Layman is not seen to disclose or suggest at least the claimed features of (i) extracting the blocks of the first group, and (ii) extraction of the blocks of the second group.

The Office Action took the position that paragraphs [0079] to [0082] of Layman disclose extracting the blocks of a first and second group. However, Applicants respectfully submit that the cited portions of Layman merely describe serializing an object by generating a datastruct element, inserting the datastruct element into the body of a message, and sending the message to the destination entity to be parsed and deserialized. According to Layman, deserialization of the object is based merely upon the parsed datastruct element which is only in the body of the message. See Layman, Figure 3.

Thus, Layman is not seen to disclose or suggest at least the claimed features of (i) extracting the blocks of the first group, and (ii) extraction of the blocks of the second group.

Independent Claim 12 is an apparatus claim substantially corresponding to the method of Claim 6. Accordingly, Applicants submit that Claim 12 is also in condition for allowance and respectfully requests the same.

The other claims in the application are each dependent from the independent claims and are believed to be allowable over the applied references for at least the same reasons. Because each dependent claim is deemed to define an additional aspect of the invention, however, the individual consideration of each on its own merits is respectfully requested.

Turning finally to a formal matter involving Applicants' claim to foreign priority, it is respectfully requested for the PTO to acknowledge receipt of Applicants' priority document filed on July 11, 2003.

No other matters being raised, it is believed that the entire application is fully in condition for allowance, and such action is courteously solicited.

### CONCLUSION

No fees are believed to be due; however, should it be determined that additional claim fees are required, the Director is hereby authorized to charge such fees to Deposit Account 50-3939.

Applicants' undersigned attorney may be reached in our Costa Mesa, California office at (714) 540-8700. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

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